



MEMO ENDORSED

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BY FAX (212) 805-7906
Honorable Denny Chin
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1020
New York, NY 10007-1312

USDC SDNY
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Re: *Kraft v. City of New York et al.*, 07-CV-2978 (DC)

Dear Judge Chin:

I am the Assistant Corporation Counsel newly assigned to represent the City of New York in the above-referenced action. I write to respectfully request that the City's time to respond to the Complaint be extended until July 9, 2007. This the City's first request for an extension.

I seek this extension so I may investigate the allegations contained in the Complaint and draft an appropriate response. Plaintiff has consented to the extension. In speaking with plaintiff's counsel I learned that she intends to serve defendants New York City Health and Hospitals Corporation, and Dr. Eli Greenberg, Dr. Fadi Haddad, Dr. Alyson Malloy and Dr. Amy Cohen. In anticipation that my representation will extend to these defendants my request for an extension also contemplates the need to investigate the allegations against these defendants and draft a single response on behalf of all City defendants, after they are properly served.

Thank you for your courtesy and consideration in this matter.

Respectfully yours,

Elizabeth A. Wells (EW 7362)
Assistant Corporation Counsel

Approved
by ORDERED

cc: Rose Weber (by fax)

5/11/07